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	Attorneys for the United States	
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	UNITED STATES DISTRICT COURT	
10	DISTRICT OF NEVADA	
	DISTRICT	OF NEVADA
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12	United States of America,	0.10 CD 40 CMNI DAI
	Plaintiff,	2:16-CR-46-GMN-PAL
13	Fiamum,	Proposed Order Unsealing ECF
	v.	Filings
14	v.	Timigs
15	Cliven Bundy, et al.,	
19		
16	Defendants.	
10	2 01011441100	
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•	The United States submits this pro	posed order identifying the
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	documents the United States agrees can	be unsealed in response to the
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	Intervenors, Las Vegas Review-Journal a	nd Battle Born Media, motion to
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	unseal, ECF 3010.	
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1 | PROPOSED ORDER

Before the Court is the Intervenors', Las Vegas Review Journal and Battle Born Media, motion to unseal ECF filings, ECF No. 3010. The Intervenors divided the filings sought to be unsealed into three tiers – Tiers 1, 2, and 3. As ordered by the Court, the government identified the ECF filings in Tier 1 to which it had no objection to being unsealed, ECF 3214. Based on the government's non-opposition,

IT IS HEREBY ORDERED that the ECF filings identified below shall be unsealed. Some exhibits identified below shall not be unsealed.

ECF	Title
746	Exhibits 3,4,5
758	Motion to Seal and Exhibits 3-4-5, if these exhibits
	are attached to this motion
759	Notice of Manual Filing (DVD)
1788	Govt. Response in Opposition to Motion in Limine to
	Exclude Court Orders and Deposition Testimony
	Payne, ECF No. 1715
1795	Exhibits to Motion for Acquittal, ECF No. 1794
1796	Exhibits to Motion for Acquittal, ECF No. 1794
1810	Sealed Transcript of Jury Trial on 2/14/17
1843	Payne's Reply to Govt. Response in Opposition to
	Motion in Limine to Exclude Court Orders &
	Deposition Testimony
1882	Sealed Transcript of Jury Trial Day 1
1916	Payne's Reply to Govt. Response to Motion for
	Unredacted OIG Report
1931	Govt. Response to Renewed Motion to Dismiss for
	Destruction of Evidence or in the Alternative for a
	Remedial Jury Instruction, ECF No. 1878
1936	Exhibits to Motion for Acquittal, ECF No. 1935
1937	Exhibits to Motion for Acquittal, ECF No. 1935
1938	Exhibits to Motion for Acquittal, ECF No. 1935
1939	Exhibits to Motion for Acquittal, ECF No. 1935

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3021	Sealed Subpoena Return re: Payne Subpoena #2921
3027	Payne's Reply to Govt. Response to ECF Nos. 2856-
	2833-2906
3071	Exhibits to 10/23/17 Evidentiary Hearing re ECF No.
	2768
3083	Exhibits to Govt. Brief re: Mistrial, ECF No. 3081, and
	Exhibits 1-5,7-13,15-28
	(Exhibits 4, 8, 12, 13, 20, 26 were previously filed
	publicly)
	Exhibits 6 and 14 remain under seal
3088 Motion for Joinder to Reply, ECF No. 3060, an	
	Motion to Dismiss, ECF No. 3087

Respectfully submitted,

DAYLE ELIESON United States Attorney

s/Daniel R. Schiess
STEVEN W. MYHRE
NADIA J. AHMED
DANIEL R. SCHIESS
Assistant United States Attorneys

Attorneys for the United States

IT IS SO ORDERED this 3rd day of May, 2018.

Peggy A. Leen

United States Magistrate Judge

CERTIFICATE OF SERVICE

I certify that I am an employee of the United States Attorney's Office. A copy of the foregoing Proposed Order to Unseal ECF Filings was served upon counsel of record via cm/ecf.

DATED this 30th day of April, 2018.

s/Daniel R. Schiess

DANIEL R. SCHIESS

Assistant United States Attorney